There are significant similarities and parallels between this proposal and RM-10867 from the ARRL. I would suggest that, with a single exception, much could be gained by an NPRM that would represent an integration of RM-10867 and RM-10870. That exception is this proposals suggestion to completely eliminate Morse testing. I feel that a very modest Morse requirement should still be a part of the highest license class in the Amateur Service.